

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No. 05-10917 PBS

	)	
The HipSaver Company, Inc.,	)	
Plaintiff,	)	
	)	
v	)	
	)	
J.T. Posey Company,	)	
Defendant.	)	
	)	
_____	)	
	)	
J.T. Posey Company, Inc.,	)	
Counterclaim Plaintiff,	)	
	)	
v	)	
	)	
The HipSaver Company, Inc. and	)	
Edward L. Goodwin,	)	
Counterclaim Defendants.	)	
	)	
	)	
_____	)	

**PLAINTIFF’S MOTION TO ALLOW ADDITIONAL LIMITED DISCOVERY**

Plaintiff moves this Court to allow The HipSaver Company to conduct additional limited discovery on two specific unresolved issues that were only recently brought to HipSaver’s attention. As set forth in the accompanying memorandum, the proposed discovery is specifically tailored to cause minimal intrusion on the defendant and third parties. In the interest of compiling a complete record, HipSaver respectfully requests that the Court allow Plaintiff to conduct the proposed discovery.

CERTIFICATE PURSUANT TO CIVIL LOCAL RULES 7.1 and 37.1

I certify that counsel to the parties conferred by telephone on January 19, 2006,  
and were unable to resolve the issues identified in this Motion.

Respectfully submitted,  
THE HIPSAVER COMPANY, INC.  
By its Attorneys,

/s/ Courtney M. Quish  
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Dated: January 23, 2006

**CERTIFICATE OF SERVICE**

I certify that this document has been filed through the Electronic Case Filing System of the United States District Court for the District of Massachusetts and will be served electronically by the court to the Registered Participants identified in the Notice of Electronic filing.

/s/ Courtney M. Quish  
January 23, 2006

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